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*Attorneys for Defendants Persistence*

*Technologies (BVI) PTE Ltd.*

*and Tushar Aggarwal*

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

TAYLOR THOMSON,

Plaintiff,

v.

PERSISTENCE TECHNOLOGIES (BVI) PTE LTD., TUSHAR AGGARWAL, and ASHLEY RICHARDSON,

Defendants.

Case No. 2:23-cv-04669-MEMF-MAR

**DECLARATION OF ANNAMARIE A. VAN HOESEN IN SUPPORT OF DEFENDANTS PERSISTENCE TECHNOLOGIES (BVI) PTE LTD. AND TUSHAR AGGARWAL'S MOTION TO DISMISS**

District Judge: Hon. Maame Ewusi-Mensah Frimpong

Magistrate Judge: Hon. Margo A. Rocconi

Date: January 18, 2024

Time: 10 a.m. PT

Courtroom: 8B

**DECLARATION OF ANNAMARIE A. VAN HOESEN**

I, AnnaMarie A. Van Hoesen, respectfully declare and state as follows:

1. I am a partner at Jenner & Block LLP and counsel for Defendants Persistence Technologies (BVI) PTE Ltd. (“Persistence”) and Tushar Aggarwal (together, “Moving Defendants”) in the above-captioned action. I submit this Declaration in support of Moving Defendants’ Motion to Dismiss Plaintiff’s First Amended Complaint, to put before the Court a document referenced in the Motion to Dismiss. Unless otherwise stated, this declaration is based on my personal knowledge and my review of, and familiarity with, the record in this case. If called upon to testify, I could and would competently testify thereto.

2. Attached as **Exhibit 1** is a true and correct copy of the Notice of Arbitration in the Matter of an Arbitration under the Arbitration Rules of the Singapore International Arbitration Centre (“Arbitration Notice”) between Persistence and Ms. Taylor Thomson (“Plaintiff”). The Arbitration Notice includes a copy of the Token Sale Agreement (“TSA”) executed on August 25, 2021 between Persistence and Plaintiff.

3. Counsel for Plaintiff sent the Arbitration Notice to my partner Kayvan B. Sadeghi, as counsel for Moving Defendants, who was admitted *pro hac vice* on September 25, 2023. (ECF No. 28.)

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 10, 2023 at Los Angeles, California.

*/s/ AnnaMarie A. Van Hoesen*

AnnaMarie A. Van Hoesen